

Davis, Graham & Stubbs LLP

A LIMITED LIABILITY PARTNERSHIP
ATTORNEYS AT LAW

SUITE 4700

370 SEVENTEENTH STREET
DENVER, COLORADO 80202

MAILING ADDRESS
POST OFFICE BOX 185

DENVER, COLORADO 80201-0185

TELEPHONE 303-892-9400 FACSIMILE 303-893-1379 TELEX 413726 DGS DVR UD CABLE DAVGRAM, DENVER

March 16, 2000



See I. 13. 7

BOULDER, CO OFFICE

VIEW POINT ON THE PARKWAY
4410 ARAPAHOE AVENUE
SUITE 200
BOULDER, COLORADO 80303
TELEPHONE 303-544-5990
FACSIMILE 303-544-5997

VIA PRIORITY MAIL

JOHN R. JACUS

(303) 544-4472

john.jacus@dgslaw.com

Lauren C. Buehler, Esq. Enforcement Attorney United States EPA Region 8 999 18th Street, Suite 500 Denver, Colorado 80202-2466

Ref: 8ENF-L

Dear Ms. Buehler:

I am in receipt of your letter of February 24, 2000. I respond herein to your request for additional information from our client, Hecla Mining Company.

First, with respect to your request that we confirm the SOPs submitted with our proposed work plans are complete, I am informed that they are. We prepared six SOPs, numbered 1-6, but because we prepared two separate plans, and because not all SOPs are pertinent to each plan, there appear to be gaps in the numbers of SOPs referenced in the separate reports. I hope this clarifies any confusion this may have caused.

Additionally, I have enclosed portions of two reports entitled "Preliminary Process Design for Treatment and Neutralization of Existing Solid and Liquid Wastes at the Apex Mine", dated February, 1989 and "Preliminary Waste Disposal Facilities Design Report-Apex Mine", April, 1990, both of which were prepared for Hecla by Steffen, Robertson and Kirsten (U.S.), Inc. One of these reports references a "Table Two" that you are interested in, but as you will notice from the enclosed copy, that table was not finalized, and I am informed by my client that the entire report was never finalized beyond the preliminary version we are providing to you herein. The related, earlier report of February, 1989, a copy of which is also enclosed in part, does contain a similar table, however. We refer you to that Table 2-1 concerning chemical reagents used at the Apex facility.

Lauren C. Buehler, Esq. March 16, 2000 Page Two

We hope the enclosed excerpts are responsive to your request and would be happy to address any further questions or concerns you may have regarding them or the matters addressed in them.

Very truly yours,

John R. Jacus

foi

Davis, Graham & Stubbs LLP Attorneys for Hecla Mining Company

JRJ:mmt

Enclosures

cc: (w/enc.) John N. Galbavy, Esq. (w/enc.) Mr. Clint Strachan